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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

JASVIR SINGH; RANVIR SINGH,

Plaintiffs,
vs.

ROBERTS TIRE SALES, INC., an Arizona
Corporation, individually and dba ROBERTS
TIRE COMPANY; WILLIAM R. STATON;
FLEET EQUIPMENT CORPORATION, a
New Jersey Corporation,

Defendants.

Case No.

COMPLAINT FOR DAMAGES FOR
NEGLIGENCE

DEMAND FOR JURY TRIAL

COMES NOW plaintiffs JASVIR SINGH and RANVIR SINGH, and for their
Complaint against defendants allege and states as follows:

I. PARTIES, JURISDICTION, AND VENUE

1. At all times relevant hereto, plaintiff JASVIR SINGH (hereinafter “J.SINGH”) is
and was a resident of Kern County, California. He was injured while driving in Mohave County,
Arizona.

2. At all times relevant hereto, plaintiff RANVIR SINGH (hereinafter “R.SINGH”) is
and was a resident of Kern County, California. He was injured while riding as a passenger in a
vehicle driven by plaintiff J. SINGH in Mohave County, Arizona.

COMPLAINT FOR DAMAGES FOR NEGLIGENCE

3. Defendant ROBERTS TIRE SALES, INC., is, and at all times relevant to this Complaint was, a corporation organized and existing under the laws of the State of Arizona, with its principal place of business in Arizona.

4. At all times relevant hereto, defendant WILLIAM R. STATON (hereinafter “STATON”), an individual, is and was, upon information and belief, a resident of the State of Pennsylvania.

5. Defendant FLEET EQUIPMENT CORPORATION, is a corporation organized and existing under the laws of the State of New Jersey, and whose principal place of business is in New Jersey.

6. This court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §1332, as the respective parties are citizens of different states. Venue is properly set in the United States District Court, Arizona District pursuant to 28 U.S.C. §§1391(b)(2), as the causes of action alleged herein arise from an accident and injuries which occurred in this judicial district.

7. The amount in controversy is in excess of \$75,000, in that plaintiffs J. SINGH and R. SINGH have suffered severe injuries as a result of the accident.

II. FACTS COMMON TO ALL CLAIMS

8. On or about February 1, 2016, at approximately 1:21 a.m., plaintiff J. SINGH was driving a 2016 Volvo truck tractor and pulling a white box trailer, traveling in the #1 lane of westbound Interstate 40, in the City of Yucca, in Mohave County, Arizona. At the same time, defendant STATON, who was driving a 2006 Peterbuilt commercial motor vehicle straight truck, registered to defendant ROBERTS TIRE COMPANY, was traveling eastbound in the #1 lane of westbound Interstate 40, directly the path of plaintiff J. SINGH’s oncoming tractor trailer vehicle. Plaintiff J. SINGH was unable to avoid colliding with STATON and sustained personal

1 injuries in the accident. Plaintiff R. SINGH was a passenger in J. SINGH's truck trailer and was
 2 in the sleeper berth at the time of the accident. R. SINGH sustained personal injuries as a result
 3 of the collision.

4 9. Plaintiffs are informed and believe that defendant FLEET EQUIPMENT
 5 CORPORATION is an Interstate Carrier for the 2006 Peterbuilt commercial motor vehicle
 6 straight truck driven by Defendant STATON.
 7

8 **III. CAUSES OF ACTION**

9 **NEGLIGENCE**

10 10. Plaintiffs reallege and incorporate herein by reference the allegations set forth in
 11 paragraphs 1 through 9 of this Complaint.
 12

13 11. At said time and place, defendants, and each of them, negligently maintained,
 14 operated, controlled and entrusted said vehicle. A direct result of defendants' use, operation
 15 control and driving of its vehicle was to cause a collision between defendants' vehicle and
 16 Plaintiff S. SINGH's vehicle, directly causing the damages and injuries hereinafter set forth.
 17

18 12. As a direct and legal result of the defendants' negligence, and each of them,
 19 plaintiffs were hurt and injured in their health, strength and activity, sustaining injury to their
 20 persons, all of which injuries have caused, and continue to cause, plaintiffs great mental,
 21 physical, emotional and nervous pain and suffering.
 22

23 13. As a further direct and legal result of the negligence of defendants, and each of
 24 the, plaintiffs were required to incur medical and incidental expenses.

25 **IV. DAMAGES**

26 14. Plaintiffs have suffered general and special damages, incidental and consequential
 27 damages as the direct result of the acts and omissions of the defendants, and each of them, which
 28

1 damages shall be fully proven at the time of trial. These damages include, but are not limited to:
2 General pain and suffering; physical injury; loss of enjoyment of life; both past and future;
3 medical and medical-related expenses, both past and future; emotional distress; and all other
4 ordinary, incidental and consequential damages as would be anticipate to arise under the
5 circumstances.
6

7 **V. DEMAND FOR JURY**

8 15. Plaintiffs hereby demand a trial by jury.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, plaintiffs pray for the following relief:

11 A. That the Court award plaintiffs judgment against defendants in such sums as shall
12 be determined to fully and fairly compensate the plaintiffs for all general, special, incidental and
13 consequential damages incurred, or to be incurred, as the direct and proximate result of the acts
14 and omissions of the defendants, in an amount to be proven at trial;

15 B. That the Court aware the plaintiffs their costs;

16 C. That the Court award the plaintiffs the opportunity to amend or modify the
17 provisions of this Complaint as necessary or appropriate after additional or further discovery of
18 is completed in this matter, and after all appropriate parties have been served; and

19 D. That the Court award such other and further relief as it deems necessary and
20 proper in the circumstances.
21

22 RESPECTFULLY SUBMITTED this 29th day of January, 2018.

23 THE LAW OFFICES OF
24 YOUNG WOOLDRIDGE, LLP

25 By /S/ Thomas A. Brill.
26 Thomas A. Brill, Esq.
27 Attorneys for Plaintiffs
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